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17 **Attorneys for: Defendant City of Tucson**

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF ARIZONA

13 CARRIE FERRARA CLARK,

14 Plaintiff,

15 vs.

16 CITY OF TUCSON,

17 Defendant.

No.

NOTICE OF REMOVAL

Pima County Superior Court
Case No. C20143985

20 Defendant City of Tucson under 28 U.S.C. and § 1446 and LRCiv 3.6,
21 hereby remove Pima County Superior Court Case No. C20143985 to the United
22 States District Court for the District of Arizona. Removal is proper for the
23 following reasons:

24 1. Plaintiff Carrie Ferrara Clark filed her complaint in Pima County Superior
25 Court on July 23, 2014. Defendant City of Tucson was served on October 17,
26 2014.

1 2. The Plaintiff's Complaint includes a claim under 29 U.S.C. § 207(r) and §
2 215 for alleged violations of the Fair Labor Standards Act. See *Complaint Count*
3 *One*.

4 3. This Court has original jurisdiction over the Plaintiff's suit under 28 U.S.C.
5 § 1343(a)(3).

6 4. Following LRCiv 3.6(b), true and complete copies of all pleadings and
7 other documents filed in state court are attached as Exhibit A.

8 5. A copy of this Notice of Removal has been filed with the Pima County
9 Superior Court and mailed to Plaintiff.

10
11
12 DATED December 8, 2014

13 MICHAEL G. RANKIN
14 City Attorney

15
16 By s/Michael W. L. McCrory
17 Michelle Saavedra
18 Michael W.L. McCrory
19 Attorneys for Defendant

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CERTIFICATE OF SERVICE

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I hereby certify that on December 8, 2014, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Jeffrey H. Jacobson
JACOBSON LAW FIRM
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Tucson, AZ 85716
Attorney for Plaintiff

By B. Munguia